

Robert N. Werlin, Esq.  
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21 Custom House Street  
Boston, MA 02110

BY FAX AND U.S. MAIL

RE: Boston Edison Company, D.T.E. 02-80A

February 13, 2003

Dear Mr. Werlin:

Enclosed please find the Department's second set of information requests on the above-captioned matter. Responses should be filed on or before February 27, 2003. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.  
Hearing Officer

cc: Mary Cottrell  
Staff as assigned  
Judith Laster, Assistant Attorney General

Encl.

SECOND SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BOSTON EDISON COMPANY, D.T.E. 02-80A

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "BECo" or "Company" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents BECo filed in this proceeding.
3. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
7. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

Second Set of Department Information Requests

8. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Mark Barrett, Rates and Revenue Requirements Division; (3) Claude Francisco, Rates and Revenue Requirements Division; (4) Barry Perlmutter, Electric Power Division; and (5) Sean Hanley, Rates and Revenue Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BOSTON EDISON COMPANY, D.T.E. 02-80A

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests.

- DTE-2-1      In reference to Exh. BEC-RAP-1, at 4-5 and Exh. BEC-RAP-2, at 4-5, please provide schedules for calendar years 2002 and 2003 that show:
- a) the monthly and annual average costs per kilowatt hour ("KWH") for deliveries from each non utility generator ("NUG") and for all NUGs for BECo;
  - b) the monthly and annual average "above market" costs per KWH for deliveries from all NUGs for BECo; and
  - c) the percentage proportion of the annual delivery from each NUG compared to the total annual deliveries from all NUGs for BECo.
- DTE-2-2      Based on the results in DTE-2 - 1, please confirm if the average costs per KWH of Entergy Nuclear are less than the corresponding overall average costs. If yes, please explain the reasons why the 2003 forecast delivery from Entergy Nuclear would decrease compared to the 2002 deliveries.
- DTE-2-3      Please refer to Exh. BEC-RAP-1, at 4, line 1 and Exh. BEC-RAP-2, at 4, line 1. Please explain the reasons why deliveries from Canal 1 were discontinued in November 2002 and why no delivery is projected for 2003.
- DTE-2-4      (a) Were there any instances in which certain BECo customers were placed on default service, but were later found to be eligible for standard offer service and were then transferred to standard offer service? If yes, were customers transferred from default service to standard offer service and refunded the difference between the default service price and the standard offer service price for the period of time they remained on default service? If there are settlements or judgments, please submit copies to the Department.
- (b) If the answer to (a) is affirmative, please explain how the costs associated with this transfer were treated in regards to the reconciliation of standard offer and default service. What was the additional standard offer revenue as a result of these transactions? Please provide all calculations, schedules and working papers.